

# Exhibit D



Gabe Anderson <gabe@consovoymccarthy.com>

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## SFFA v. Naval Academy

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Gardner, Joshua E (CIV) <Joshua.E.Gardner@usdoj.gov>

Wed, Jan 17, 2024 at 5:20 PM

To: Thomas McCarthy <tom@consovoymccarthy.com>, Cam Norris <cam@consovoymccarthy.com>, Michael Connolly <mike@consovoymccarthy.com>, Patrick Strawbridge <patrick@consovoymccarthy.com>, Gabe Anderson <gabe@consovoymccarthy.com>

Cc: "Yang, Catherine M (CIV)" <Catherine.M.Yang@usdoj.gov>, "Gargeya, Medha (CIV)" <Medha.Gargeya@usdoj.gov>, "Carmichael, Andrew E. (CIV)" <Andrew.E.Carmichael@usdoj.gov>, "Mendez, Chris E. (CIV)" <Chris.E.Mendez@usdoj.gov>

Counsel:

Attached are Defendants' initial disclosures, requests for production of documents and interrogatories.

In addition, please see the attached letter regarding Defendants' PROD001, which has the Bates range USNA-01 to USNA-499. You all will have

A large black rectangular redaction box covering several lines of text.

Once you have had a chance to review the data dictionaries included in today's production, we will need to confer over the data fields you believe you need, due to numerous technological limitations and burdens in exporting the data. We are generally available on Monday, January 22.

Finally, now that the protective order is in place, can you please provide us with the complete names of Members A and B?

Regards,

Josh

Joshua E. Gardner

Special Counsel

Federal Programs Branch

United States Department of Justice, Civil Division

1100 L Street, NW., Rm. 11502

Washington, D.C. 20005

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**4 attachments**



**Defendants Initial Disclosures.pdf**

188K



**Defendants' First Set of Interrogatories.pdf**

160K



**Defendants' First Set of RFPs.pdf**

160K



**2024.01.17 Defs' Production Letter - PROD001.pdf**

150K